

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
	:	
Mark A. Gonsky,	:	CHAPTER 7
Debtor	:	
	:	
M&T Bank,	:	NO. 15-03375 JJT
Movant	:	
	:	
Mark A. Gonsky,	:	11 U.S.C. Section 362
Debtor	:	
	:	
Robert P. Sheils, Jr., Esquire,	:	
Trustee	:	

**ANSWER TO MOTION OF M&T BANK FOR RELIEF FROM THE  
AUTOMATIC STAY UNDER SECTION 362**

1. Admitted.
2. Admitted.
3. Denied. After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph three and strict proof thereof is demanded.
4. Denied. Robert P. Sheils, Jr., Esquire is the Trustee appointed by the Court.
5. Admitted.
6. Denied. After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph six and strict proof thereof is demanded. By way of further answer, it is believed and therefore averred that the Debtor has significant equity in the properties, the distribution of which will benefit many of the Debtor's creditors.

7. Denied. After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph seven and strict proof thereof is demanded.

8. Denied. After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph eight and strict proof thereof is demanded.

10. Denied. After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph ten and strict proof thereof is demanded.

11. Denied. After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of the averment in Movant's paragraph eleven and strict proof thereof is demanded.

**WHEREFORE**, Robert P. Sheils, Jr., Esquire, Chapter 7 Trustee, respectfully requests this Honorable Court deny Movant's motion and for such other and further relief as this Court shall deem just and proper.

Dated: August 23, 2016

/s/ Jill M. Spott  
Jill M. Spott, Esquire  
Attorney for Trustee  
108 North Abington Road  
Clarks Summit, PA 18411  
(570) 587-2600 – Telephone  
(570) 585-0313 - Facsimile  
jspottesq@sheilslaw.com